

AERONAUTICAL CHARTING FORUM
Instrument Procedures Group
April 29-30, 2002
HISTORY RECORD

FAA Control # 02-01-238

Subject: Part 97 “Basic” Minima; ATC DP Minima, and DP NOTAMs

Background/Discussion: Interrelated are the issues of Part 97 takeoff minimums, ATC DPs, and associated NOTAMs. Recently there was considerable action by D NOTAM at San Jose, California (KSJC) to bring several ATC DPs into compliance with criteria. Further, the Part 97 takeoff minimums and climb gradients were increased by FDC NOTAM to protect for issues with the ATC DPs, rather than with the obstacle DP for the airport. The result is to trade one set of human-factors issues and problems presented to flight crews for another set of such issues and problems.

Pilots will look at only one chart to determine the flight’s legality and safe course of action for a DP. Only where a graphical DP is not assigned by ATC will pilots refer to the Part 97 takeoff minimums and obstacle DP (if any). Human-factors experts recognize that pilots can only successfully focus on one chart for a complex operation, such as the typical ATC DP. Although this group has agreed in the past that each charted ATC DP must stand on its own, both as to minimums and procedure requirements, implementation has a long ways to go.

Chart makers will not chart changes to DPs, since the NOTAMs are not regulatory. Thus, pilots are often misapplying minimums and procedural requirements because they fail to apply obscure and sometimes complex DP NOTAMs. To attempt to correct a chart for such NOTAMs is fraught with potential for error and misinterpretation. The aviation safety system is best served when pilots are provided with charts that accurately reflect the minimums and procedure to be used. In two cases of which ALPA is aware, DPs were NOTAMed “NA” for several years, yet the chart continued to be carried as current by both NACO and Jeppesen.

An additional complication in the present DP mix is the transition to the elimination of a ceiling and visibility alternative to a climb gradient for obstacles located beyond three miles from the departure end of a runway. AVN-100 has been noted applying these new concepts piecemeal to an ATC DP for an airport without reviewing and updating the Part 97 minimums and other applicable ATC DP minimums for such specific airport.

Recommendation: Either the NOTAM system and/or policy must be changed to permit the charting of any DP NOTAM that is considered to be permanent, pending a paper amendment. When any DP or Part 97 minimums and procedures are revised by AVN-100, the entire takeoff minima and DP structure for the airport must be reviewed (and revised as necessary) as a complete package.

Comments: This affects NOTAM system policies and procedures and instrument flight procedures implementation and design policies.

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INITIAL DISCUSSION (Meeting 02-01): New issue presented by Wally Roberts, ALPA. ALPA is concerned that NOTAMs relating to DPs are promulgated as NOTAM Ds vice FDC NOTAMs. Bill Hammett, AFS-420 (ISI), briefed current NOTAM policy in Order 8260.19 is dictated by ATP-300 under Order 7930.2, Notices to Airmen. Currently, textual DP NOTAMs use the FDC process. Graphic DPs and STARs use NOTAM Ds. Initial coordination with Gary Bobik, ATP-320, indicates that they are agreeable to having DP and STAR NOTAMs use the FDC process. Bill has suggested that this change occur on 20 Feb 2003 in consonance with the return of the term SID. The cut off date for submission to meet the February date is August 8, 2002. Bill and Gary Powell, ATP-104, have agreed to provide recommended text to Gary Bobik ASAP to facilitate the change and preparation of the Document Change Proposal. **Editors Note: Recommendations were forwarded to ATP-320 on May 20th.** Once it is assured that the change will be made to Order 7930.2, Order 8260.19 will be revised accordingly. Wally also expressed concern that AVN-100 is, in at least one instance, applying new criteria/policy to an ATC DP without reviewing the basic IFR Departure Procedure and associated weather minimums. ALPA recommends that if one DP is revised under new standards, then all DPs for that airport be concurrently reviewed. Norm LeFevre AFS-420 took an IOU to pursue a policy change for Order 8260.19 to accommodate this portion of the recommendation.
ACTION: AFS-420, ATP-104, ATP-320.

MEETING 02-02: Bill Hammett, AFS-420 (ISI), briefed that ATP-320 is agreeable to using the FDC process for DP and STAR NOTAMs; however, both procedures will have to be changed simultaneously. AFS-420 forwarded document change proposal (DCP) information for using the FDC process for all DPs to ATP-320 on May 20, 2002. However, ATP-104 required additional time to coordinate the STAR conversion. It is hoped that this change will be incorporated in Change 3 to Order 7930.2H which is effective August 7, 2003 (cutoff for submission is February 20, 2003). Policy to ensure all DPs for a given airport are concurrently reviewed anytime one DP is revised under new standards has been included in Order 8260.46B, paragraph 12e(8). **ACTION: AFS-420, ATP-104, ATP-320.**

MEETING 03-01: Bill Hammett, AFS-420 (ISI), briefed that ATP-320 has expressed agreement to using the FDC process for DP and STAR NOTAMs; however, both will have to be changed simultaneously. AFS and AVN are ready to proceed with DP FDC NOTAMs when given the go-ahead by ATP-320. Gary Powell, ATP-500 is still working the STAR issue and noted that a change to Order 7930.2 *Notices to Airmen (NOTAMs)*, which re-defines various type NOTAMs will probably be required to issue DP and STAR NOTAMs under the FDC process. Bill agreed that Order 7930.2, as the source document for all Flight Standards NOTAM policy and requirements, should be updated. Gary agreed to take this issue to ATP-300 for consideration. **ACTION: ATP-500.**

MEETING 03-02: Bill Hammett, AFS-420 (ISI), briefed that this issue was addressed at the last Aeronautical Information Services Working Group (AISWG) meeting. Although it is desired to have DPs and STARs use the same NOTAM format, ATP-320 is willing to accept and coordinate using FDC NOTAMs for DPs only if necessary. Instances have arisen where the NOTAM D format would not accept a long DP NOTAM. Since all DPs are under the policy purview of AFS, AFS-420 is agreeable to providing the Document Change proposal (DCP) information to ATP-320 for processing. However, STARs are still under the purview of ATP-500. Gary Powell, ATP-500, will coordinate STAR NOTAM inclusion under the FDC

process within Air Traffic. This change will require revision to Orders 7930.2 *Notices to Airmen (NOTAMs)* and 7210.3, *Facility Operation and Administration*. Changes to AT publications are accomplished bi-annually with a 6-month lead-time; therefore, all work must be completed NLT February 19, 2004 for an effective date in August. **ACTION: ATP-500 and AFS-420.**

MEETING 04-01: Bill Hammett, AFS-420 (ISI), briefed that there had been no progress on this issue due to higher priority taskings. **ACTION: ATP-500 and AFS-420.**

MEETING 04-02: Bill Hammett, AFS-420 (ISI), briefed that he had begun drafting the document change proposal (DCP) to Order 7930.2 to include SIDs and STARs under the FDC NOTAM process. However, the forum must keep in mind that this is an Air Traffic Order and that Flight Standards assistance in accomplishing this change is secondary to normal business. Bill also requested that Paul Ewing, ATO-R (AMTI), coordinate an Air Traffic position on STARS being included under the FDC process.

Editor's Note: Paul Ewing, ATO-R (AMTI), confirmed after the meeting that Air Traffic has no objection to including STAR NOTAMs under the FDC process. He requested to be kept apprised of progress so that Order 7100.9 could also be updated. **ACTION: AFS-420.**

MEETING 05-01: Bill Hammett, AFS-420 (ISI), briefed at the last meeting that he had begun drafting verbiage for the document change proposal (DCP) to Order 7930.2 to include SIDs and STARs under the FDC NOTAM process. Coordination with the RNAV/RNP office confirmed that Air Traffic has no objection to including STARs under the FDC NOTAM process. However, no further progress has been made on the issue since the last meeting. Bill noted that the forum must keep in mind that this is an Air Traffic Order and that Flight Standards assistance in accomplishing this change is secondary to normal business. Bill also noted that the OPR for the NOTAM Order has been moved from the Vice President for Flight Services (ATO-D) to the Vice President for System Operations Services (ATO-R). Hopefully, this organizational re-alignment will prompt a re-write of Order 7930.2. Bill took the IOU to ensure the staff person responsible for the Order is advised of the requirement. **ACTION: AFS-420 and System Operations Services (ATO-R).**

MEETING 05-02: Bill Hammett, AFS-420 (ISI), briefed that at the last meeting he took an IOU to ensure the staff person responsible for Order 7930.2, *Notices to Airmen (NOTAMs)* under the new ATO organization was made aware of the ACF-IPG issue to include SIDs and STARs under the FDC NOTAM process. A memorandum requesting revision to the Order was signed by AFS-400 on July 1 and forwarded to ATO-R with an information copy to the Notices to Airmen Group. A copy of the memorandum was provided with the meeting handout material and included in the meeting minutes as attachment 6. **ACTION: Notices to Airmen (NOTAMs) Programs Group, AJR-46.**

MEETING 06-01: Bill Hammett, AFS-420 (ISI), briefed that no response has been received from the Notices to Airmen (NOTAMs) Program Group, AJR-46. A representative from the office was not in attendance. Status is unchanged. **Action: Notices to Airmen Programs Group, AJR-46.**